



October 6, 2015

The Honorable Mike Shirkey, Chair
Health Policy Committee
Michigan Senate
P.O. Box 30036
Lansing, MI 48909-7536

Re: Senate Bill 338

Dear Senator Shirkey:

Michigan Assisted Living Association (MALA) appreciates the opportunity to provide input regarding Senate Bill 338. MALA is a nonprofit association representing over 1,000 members providing services to over 36,000 Michigan residents in licensed adult foster care (AFC) homes, licensed homes for the aged (HFA) and other assisted living programs throughout the state.

In Michigan we have approximately 230 HFAs serving over 17,000 older adults. HFAs are licensed and inspected, at least annually, by the Department of Licensing and Regulatory Affairs (LARA). In fact, while serving as the State Long Term Care Ombudsman, I had the privilege to be appointed to the committee that promulgated the current administrative rules for HFAs. I have also been employed as an Executive Director of several assisted living communities and now serve as the Director of Quality Assurance and Education for MALA.

It is important to note that HFAs are not skilled nursing facilities. Most HFAs offer private rooms or apartments. The typical resident is 85 years old and pays the HFA for rent, meals and services with personal savings and retirement income. In addition, some HFA residents rely on veteran benefits while others access the MI Choice Medicaid Waiver program.

While MALA respects the intent of SB 338, we oppose its enactment for the following reasons.

- Across the United States older adults receive the services provided by health care professionals in their own home on a regular basis. We believe that older adults living in HFAs should enjoy the same services as persons living in traditional family dwellings, condominiums and apartments.

In fact, Medicare makes available a host of covered health care services to older Americans in their own homes including services from nurses, physical therapists, physicians and more. MALA asserts that older adults who have chosen a home for the aged as their residence should be afforded these same services in the privacy of their home albeit a room or an apartment.

- HFAs are not medical facilities and are not skilled nursing facilities. In fact, they are prohibited by statute from offering this level of service. A unique separated medical exam room is not needed. To impose this new building requirement would create a financial burden on the